

EXHIBIT B

Westerfield, Evan B.

From: Roach, Kathleen L.
Sent: Thursday, May 07, 2009 1:13 PM
To: 'Ernie.Getto@LW.com'
Cc: 'KARL.LYTZ@LW.com'; 'MARY.ROSE.ALEXANDER@lw.com'; Westerfield, Evan B.
Subject: RE: Fox River: Appleton Papers, Inc and NCR Corporation v. George A Whiting Paper Company, et al.

Ernie:

As we have previously advised, NCR has no existing corporate relationship with any of the entities you reference below and no ability to control what happens to the records at issue. That being said, please be advised that we have asked API to request that the records be preserved indefinitely (until the issue has been finally resolved either in the US or the UK) at a solicitor's office in England.

Kathy

From: Ernie.Getto@LW.com [<mailto:Ernie.Getto@LW.com>]
Sent: Wednesday, May 06, 2009 10:06 PM
To: Roach, Kathleen L.
Cc: KARL.LYTZ@LW.com; MARY.ROSE.ALEXANDER@lw.com
Subject: FW: Fox River: Appleton Papers, Inc and NCR Corporation v. George A Whiting Paper Company, et al.

Kathy,

As you know from receiving the attached letter, we learned that thousands of documents relevant to the issues in the above case were recently shredded at the Butler's Court Research and Development Centre, Wattleton Road, Beaconsfield, Bucks HP9 1RT. However, there are two large sets of microfiche documents containing many, if not all of the documents that were destroyed at the Butler's Court facility along with a database that has 70,000 documents in it, which we are told also overlaps with the destroyed documents. In the last several days we have sought the cooperation of API, Appleton Coated, Arjo Wiggins Appleton Limited, Arjo Wiggins Fine Papers Limited, Arjo Wiggins Limited and Sequana Capital in preserving the microfiche files and database at the Butler's Court site pending the outcome of Georgia-Pacific's Motions to Compel as to API and ACC. Thus far none of those entities had agreed to cooperate. We will be going into court in Wisconsin and/or England for an emergency order preserving these documents. I wanted you to be aware of this, because given the close working relationship between NCR and the Arjo entities, we will be looking to NCR as well as the other parties if the microfiche and database at Butler's Court are destroyed or removed from the premises before GP's Motions to Compel are decided. We once again ask you take all necessary steps to preserve these records.

Ernie

Ernest J. Getto

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<<Arjo Wiggins Letter 5 May 09.pdf>>

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